



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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Janica Kyriacopoulos, Treasurer  
AMERIPAC: The Fund for a Greater  
America  
5304 McKinley Street  
Bethesda, MD 20814

MAR 21 2001

Identification Number: C00271338

Reference: October Monthly Report (9/1/00-9/30/00)

Dear Ms. Kyriacopoulos:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A, supporting Lines 11(a)(i) and 11(c) of the Detailed Summary Page, discloses earmarked contributions with incorrect aggregate year-to-date totals. The aggregate year-to-date totals for these items should reflect the amount received by the conduit from an individual, less the amount of the earmarked contributions made by that individual.

-In reporting receipts and earmarked contributions on Schedules A and B, you disclose contributions from and disbursements to political committees that fail to include a full and/or recognizable name. Using an indistinguishable acronym is inadequate. The following committee names from your report need further clarification: SEIU-COPE US and AFGE PAC. Please amend your report to include the missing information. 11 CFR §§100.12, 102.14(c) and 104.3(a)(4)(ii).

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule(s) B, supporting Line(s) 21(b) of the Detailed Summary Page.

2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

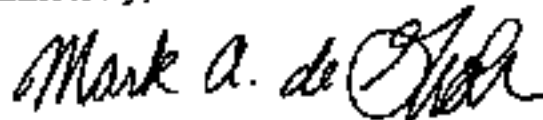
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

-On Schedule B, supporting Line 23 of the Detailed Summary Page, you improperly itemize earmarked contributions. In the field headed "Full Name, Mailing Address, and ZIP Code," you should report the pertinent information for the recipient committee, not the information regarding the original contributor. In the "Purpose of Disbursement" field, you should note the name of the original contributor and the fact that the contribution was earmarked. Please note this for future filings.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Mark A. de Groh  
Reports Analyst  
Reports Analysis Division

